I strongly disagree with NCI and its attempt to write off Morse Code completely in the ARS. Radio Amateurs now exist as the last service to use this second most popular mode of operation. Other modes, digital, are becoming very popular, but Morse remains the second most popular by a wide margin. Few will learn it if not required to do so. In connections with this, I refer the Commission to the submittal of the RM, not yet numbered, of the FISTS organization, a document with which I fully agree. In it are the reasons for desiring a 5wpm and a 12 wpm test at two licensing levels, along with more difficult testing in the more modern although not most-used digital modes. Keep Morse code testing, and retain integrity and quality in ALL amateur radio testing. The ARS is totally unique in its ability to experiment when other FCC-licensed services cannot. The testing should reflect that, and should be sufficiently difficult to attract those suited to be true radio amateurs, not just CB or FRS communicators, not to insult those very restricted unlicensed group of communicators. In time of great difficulty, nothing is simpler than a code transceiver. It can be run on batteries in an emergency. It is NOT outmoded on HF as a public service mode. It has a 13dB advantage over SSB and I personally have handled traffic using it after a major ice storm in the northern sector of NY State. Even if no key is available, two wires or other novel and crude contact devices can be used to send code. A microphone PTT switch can send code. The advantages, contrary to the stance taken by NCI, are obvious.